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Before the
FEDERAL COMMUNICATION COMMISSION
Washington, DC 20554

Amendment of Parts 2, 15, 18 and Other Parts of the Commission's Rules to Simplify and Streamline the Equipment Authorization Process for Radio Frequency Equipment	ET Docket No. 97-94

COMMENTS OF FORD MOTOR COMPANY

Ford Motor Company ("Ford") hereby comments on the above-captioned *Notice of Proposed Rulemaking*,[1] which suggests simplification and deregulation of the Commission's equipment authorization rules. Ford concurs with the agency's goal of streamlining its procedures, so as to reduce processing time and conserve staff resources. Ford suggests, however, that the Commission go further to ensure that RF devices can be brought to market in the most rapid possible interval consistent with good spectrum management.

As a large manufacturer of motor vehicles, the FCC's equipment authorization rules are of intense interest to Ford. Today's vehicles are immensely more sophisticated than in the past, and rely on a host of very low power intentional radiators to improve safety of life and provide additional consumer convenience. Many of Ford's automobiles, for example, are equipped with "remote keyless entry" devices, permitting vehicle owners easy and safe access to their cars. As

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[1] FCC 97-84 (Mar. 27, 1997) ("*NPRM*")

another example, some Ford automobiles contain "passive anti-theft" units, which reduce the risk of stolen vehicles.

In the *NPRM*, the agency recognizes that the administrative burden on entities such as Ford with large number of devices requiring equipment approval is too high. In fact, the FCC notes that the typical processing time for RF devices has slowed to 40 days or more. In the context of automobile manufacturing, additional FCC processing time lengthens the "cycle" of vehicle product changes. Yet, in the increasingly global market that Ford and its products face, longer product cycle times can undermine a vehicle's competitiveness. Indeed, as a result, delays in FCC equipment authorization could slow the creation and distribution of innovative devices that make modern vehicles as safe as possible.[2]

For these reasons, Ford enthusiastically supports the FCC's decision increasingly to rely on the simpler "declaration of conformity" ("DoC"), rather than the more complex certification or notification, for some devices. Ford particularly applauds the agency's tentative proposal to reclassify superregenerative receivers among those that would no longer have to be certified.[3] Superregenerative receivers now have a long history of compliance with the emissions limits. As such, the time has come to shift this category of devices to the DoC approach.

Nonetheless, Ford suggests that the agency consider going further in reclassifying other devices away from the certification category and require only a DoC. Each year, the FCC reviews hundreds of certification applications for extremely low power devices whose emissions,

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[2] To the extent the U.S. adopts reciprocal recognition of equipment authorization, U.S. regulatory requirements that force longer product cycles essentially will create artificial cost and marketing advantages for foreign-made vehicles.

[3] *NPRM*, ¶ 18.

dimensions, and basic design concepts are well settled. Where there is a long and successful history of demonstrated compliance – as there is for remote keyless entry and passive antitheft devices – the Commission should consider how subsequent devices in the same product "family" could be subject only to a DoC requirement for relatively minor design alterations.[4] This could be implemented through additional streamlining of the "permissive change" rules.

In addition, if the decrease in processing time remains the agency's goal, the FCC could modify the manner in which it reviews applications to examine, say, only every tenth application filed. This would conserve staff resources and reduce processing time. Moreover, because the grant of equipment authorization remains subject to the general non-interference condition,[5] the Commission can be assured both that interference will be minimized and that any subsequent interference issues will be resolved by the manufacturer in a timely fashion.

In sum, Ford concurs with the agency's goal to streamline its equipment authorization process. Increased reliance on the declaration of conformity, particularly for superregenerative revivers, will improve industrial efficiency and decrease FCC processing time without generating any measurable increase in harmful interference. Nonetheless, the Commission should consider further rule changes that would permit well-established products with long histories of non-interference to use the DoC procedure and/or alter the FCC review process to rely on "spot" or

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[4] The Commission claims that further deregulation is not possible because the remaining devices subject to certification often "raise questions concerning interpretation of the intent of the regulations" and have "the potential to thwart new communications services." *NPRM*, ¶ 19. However, implementing minor changes to devices with well-established non-interference records raises no such concerns. *Cf. NPRM*, ¶ 12 (verification is appropriate "for equipment that has an excellent record of compliance, where the measurement methods are well known and understood, and it is relatively easy to determine the party responsible for compliance.").

[5] 47 C.F.R. § 15.5(b).

"random" reviews of equipment authorization applications. Failure to promote further liberalization of the rules could delay the introduction of new products and services and decrease U.S. industrial competitiveness, including in the automotive industry.

Respectfully submitted,

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